

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

GEORGE ANIBOWEI,

Plaintiff,

v.

ALEJANDRO MAYORKAS,  
SECRETARY, U.S. DEPARTMENT OF  
HOMELAND SECURITY *ET AL.*,

Defendants.

Civil Action No. 3:16-CV-3495-D

**MOTION TO WITHDRAW**

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 83-12, undersigned counsel hereby moves this Court for an Order allowing the withdrawal of Jayce L. Born, Sam Callahan, and Graham White as counsel for George Anibowei in this action. Messrs. Callahan and White are no longer employed by Arnold & Porter Kaye Scholer LLP, and as of May 18, 2024, Ms. Born will no longer be employed by Arnold & Porter Kaye Scholer LLP, either. George Anibowei will continue to be represented by Andrew Tutt, Robert Stanton Jones, and Stephen K. Wirth of Arnold & Porter Kaye Scholer LLP, and Kassandra Gonzalez and Travis Walker Fife of Texas Civil Rights Project, and there will therefore be no disruption to the Court's calendar or the representation of George Anibowei in this action.

Dated: May 13, 2024

Respectfully submitted,

/s/ Jayce L. Born  
Andrew Tutt (*pro hac vice*)  
Robert Stanton Jones (*pro hac vice*)

Stephen K. Wirth (*pro hac vice*)  
Jayce L. Born (*pro hac vice*)  
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Attorneys for Plaintiff George Anibowei

**CERTIFICATE OF SERVICE**

On May 13, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Jayce L. Born  
Jayce L. Born